

EXHIBIT A



August 7, 1997

Jimmy Patrick
BellSouth Interconnection Services
3535 Colonnade Parkway
Birmingham, AL 35243

VIA FAX: (205) 977-0037

Re: Unsatisfactory EDI Test Progress

Dear Jimmy:

It has been reported to me by our BST EDI Account Manager, Al Witbrodt, that our EDI test progress to date with BellSouth has been unsatisfactory. Specifically he has addressed the problems outlined below. I'm requesting that you review the issues he has set forth and let us know what actions BellSouth will take in correcting these deficiencies.

- The initial EDI system test began 7/23/97 using the test data published in the 1997 LEO Guide. The initial two test cases should have resulted in receipt of an FOC and Completion Notice within 24 hours. Instead, these test cases contained data anomalies that resulted in rejections and resubmissions.
- As of 8/7/97, four test sets have been sent. There have been no EDI 855 acknowledgements sent back to LCI.
- On 8/6/97, a test case was transmitted, but we have yet to receive acknowledgment of the submission. We were unable to reach our new test coordinator at anytime during the day and have yet to hear from BellSouth.
- During the test period we lost complete contact with BellSouth for three days (July 31, Aug 1, Aug 4) due to an unannounced and unexpected change in BellSouth's test coordinator. Another day was lost (Aug 5) getting up to speed on the test status with BellSouth's EDI specialist. The new test coordinator is on vacation and has yet to contact us.

In order for LCI to complete these initial EDI tests and obtain certification, it is very important that we receive better communication and better response times from BellSouth. We anticipate that timely response and communication from BellSouth will be increasingly vital as we move into more complex testing scenarios.

Thank you for your time and attention towards this matter.

Sincerely,

Betty Baffar
LCI International

cc: Al Witbrodt

B

EXHIBIT B

From: Witbrodt, Al D.
To: Baffer, Betty; Strombotne, Tracy; Taylor, James G.
Cc: 'Vanessa Thomas(BellSouth)'; Patrick, Jimmy(BellSouth)
Subject: Purchase Order Change - Cancel Scenario
Date: Friday, August 15, 1997 11:01AM

Betty;

Please add this to the EDI issues list.

In our test scenarios with BellSouth, an EDI transaction was sent to "cancel" an existing PO at BellSouth. The expected acknowledgment was not received and will not be transmitted under the current BellSouth protocols.

The normal EDI exchange scenario for a correct Purchase Order Change(860) is a

- 1.) Functional Acknowledgment at the document level
- 2.) Purchase Order Change Acknowledgment (865) at the document level.

This protocol accomplishes two things. The first acknowledgment verifies the receipt of the document by BST. No data analysis, etc. is performed.

The second acknowledgment verifies the correctness of the data and the acceptance of the purpose(cancellation). Without this acknowledgment, LCI cannot be certain of the correctness of the cancellation or of its implementation. Our processes will be in turmoil as the status transitions can not occur with certainty in the LSOC.

I have conveyed this problem to Vanessa Thomas in a telephone conversation on August 14, 1997. She agreed to document it as a problem and submit it to the appropriate functional level at BST.

Thank you for your attention.

Al Witbrodt

DECLARATION 3

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554**

In the Matter of:

Application of BellSouth Corporation,
BellSouth Telecommunications, Inc.,
and BellSouth Long Distance, Inc.,
for Provision of In-Region, InterLATA
Services in Louisiana

CC Docket No. 97-231

**DECLARATION OF BETH RAUSCH
ON BEHALF OF LCI INTERNATIONAL TELECOM CORP.**

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554**

In the Matter of:

Application of BellSouth Corporation,
BellSouth Telecommunications, Inc.,
and BellSouth Long Distance, Inc.,
for Provision of In-Region, InterLATA
Services in Louisiana

CC Docket No. 97-231

**DECLARATION OF BETH RAUSCH
ON BEHALF OF LCI INTERNATIONAL TELECOM CORP.**

I, Beth Rausch, do hereby declare and state:

1. I am employed by LCI International Telecom Corp. ("LCI") as a Process Analyst for the ordering and provisioning of resale services. In my job I have responsibility for establishing ordering and provisioning procedures for local services offered by LCI. I am also responsible for managing the implementation of LCI's order entry systems, including the use of electronic data interchange ("EDI") interfaces, and the introduction of new products to be offered by LCI's local service division. I have five years of experience in the telecommunications industry.

2. LCI has been offering local exchange service on a resale basis in BellSouth's region since April of 1997. LCI started its resale efforts first in Georgia, followed by Florida, Tennessee, North Carolina and Kentucky. Currently, LCI resells local service to small business customers. LCI plans to begin offering service to residential customers in 1998, and also has plans to expand its local service business to other states in BellSouth's region, including Louisiana.

3. In late August of 1997, LCI began using BellSouth's EDI interface for resale ordering and provisioning. LCI's commercial use of this interface followed a testing and certification process that began in June of 1997. I was involved in that testing and certification process, and have been responsible for managing LCI's use of the EDI interface since LCI began submitting live customer orders across that interface in August.

4. LCI has experienced a number of problems in its access to BellSouth's operations support system ("OSS") in the short time that LCI has been using BellSouth's EDI interface to place resale orders. These problems have included:

- Excessive delays in the receipt of firm order confirmations from BellSouth;
- Excessive delays in the provisioning of LCI's orders;
- Manual processing of orders that should flow-through electronically to BellSouth's OSS;
- Orders that have been "lost" in BellSouth's system; and
- Substantial delays in obtaining resolution of problems due apparently to the lack of sufficient EDI training for BellSouth personnel.

Each of these problems is discussed in more detail below.

5. In an EDI environment, the purchase order form is known as an "850." After LCI submits an 850 to BellSouth, BellSouth's EDI application should respond to that order first with an order acknowledgment (a "997"), and second, assuming the order is not rejected, with a firm order confirmation (an "855"). The firm order confirmation is particularly important because it indicates that BellSouth's OSS has accepted the order, and it provides a due date for when that order will be provisioned. LCI should then receive a completion notification ("865"), notifying LCI that the order was indeed completed on the given due date.

6. In a telephone conversation on September 10, 1997, BellSouth representatives committed to LCI that BellSouth's EDI would provide firm order confirmations ("FOCs") within 24 hours after LCI had submitted its 850 purchase order. LCI prepared minutes of that telephone conversation and distributed them to BellSouth. A copy of those minutes is attached hereto as Exhibit A.

7. Attached as Exhibit B is an analysis of the performance of BellSouth's EDI system on the orders that LCI submitted from August through October of 1997. As this exhibit shows, BellSouth has missed its 24-hour interval for FOCs on 80% of LCI's orders. The average FOC response time for LCI's orders has been approximately 3.5 workdays, well in excess of BellSouth's promised interval of 24 hours. And that is only for those orders on which we have received FOCs. On approximately 38% of our orders, BellSouth has not provided any FOC via its EDI interface.

8. This delay and lack of response from BellSouth's EDI system is unacceptable for what is supposed to be electronic access to BellSouth's OSS. It has also meant that LCI's orders are delayed in provisioning, since the orders are not completed until after the firm order confirmations have been received. These are not complex orders that are being submitted by LCI; most are simple conversion orders for POTS.

9. The delays in firm order confirmations and order completions may well be attributable to the fact that most of LCI's electronic orders are falling out for manual processing at BellSouth's end, rather than flowing through electronically into BellSouth's OSS. BellSouth has informed LCI that when LCI orders need "clarification," they get "dropped out" of the system and are handled manually by a BellSouth representative. There also appears to be disagreement among BellSouth representatives as to which orders require manual processing. Some representatives have told LCI that orders with six lines or more must be handled

manually, while others maintain that any order with more than one line requires manual processing. LCI has requested written clarification of the circumstances under which orders fall out for manual processing; BellSouth has yet to respond.

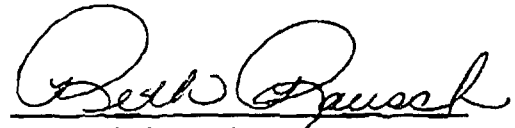
10. LCI has also had "850" purchase orders that have been effectively lost in the system. There have been a substantial number of orders -- 38% -- for which LCI received order acknowledgments, but no firm order confirmations. On a number o these orders, we had to make multiple telephone calls to BellSouth in an attempt to locate the orders and determine what the problem was. On some of the orders, BellSouth denied having received them, even though order acknowledgments had been sent. The result of this has been that LCI still has a number of orders that have not been provisioned. Indeed, as of the middle of November, BellSouth had completed only 62.5% of LCI's orders submitted through October.

11. It has been my experience to date that the BellSouth representatives are not fully and adequately trained on the EDI interface. In order to get a problem resolved, we often get passed off to numerous BellSouth representatives, none of whom profess any substantial knowledge of the EDI interface. Moreover, LCI has not had a single point of contact at BellSouth. The lack of adequately trained personnel to resolve EDI issues and problems has caused LCI to devote many hours to problem resolution, and has made the use of BellSouth's EDI interface an extremely inefficient and time consuming process.

12. Given all of the problems LCI has experienced to date with the EDI interface, we have abandoned the use of the interface and returned to manual processes to place orders. We have found that it is less burdensome and time consuming to hand write orders and submit them via facsimile machine than it is to submit them via EDI, and then deal with all the problems that occur thereafter.

13. Based on our experiences to date, I do not believe BellSouth's EDI interface for resale ordering and provisioning is operationally ready and capable of handling a reasonable commercial volume of orders. With just the small volume of orders that LCI has submitted to date, numerous problems and delays have occurred. These problems and delays have prevented LCI from obtaining access to BellSouth's OSS that is equal to that which BellSouth's own retail operations receive. The problems and delays have also impacted LCI's ability to provide service to its customers that is equal to that which is provided by BellSouth to its own customers.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct to the best of my knowledge and belief. Executed this 24th day of November, 1997 at Dublin, Ohio.


Beth Rausch

A

EXHIBIT A



September 11, 1997

To: Jimmy Patrick

Fax Number: 205-977-0037

From: Betty Baffer

Comments:

Jimmy,

My notes from the EDI meeting yesterday are attached. I'm also sending them to you via e-mail. Please distribute them to the appropriate people at BellSouth.

Thanks,
Betty

Minutes from 9-10-97 EDI Meeting

BellSouth:

Jimmy Patrick

Ken Enman

Pattie Knight

Theresa Gentry

Jerry Yarbrough

Vanessa Thomas

George Jones

LCI:

Al Witbrodt

Beth Rausch

Kristi Sutter

Betty Baffer

Odin Moody

This is a depiction of the EDI process as described on the phone:

1. LCI → (850 *Purchase Order* or 860 *Purchase Order Change* through VAN) → BS
 2. BS → (997 *functional acknowledgment*) → LCI (*due within 4 hours after LCI sends 850 or 860*)
 3. BS → (855 *FOC* or 865 *POC Acknowledgement* via EDI or *Clarification Notice* via fax) → LCI (*due within 24 hours after LCI sends 850 or 860*)
 4. BS → (865 *completion notice*) → LCI (*due within 24 hours after due date on FOC or 865 POC Acknowledgement*)
- LCI should call Jerry Yarbrough (205-988-6184) if we don't receive a functional acknowledgment with 4 hours.
 - LCI should call the BellSouth service center (1-800-773-4967) if we don't receive FOCs, POC Acknowledgement or clarification notices with 24 hours. All service center representatives have been trained to give us status on EDI orders.

- If we do not receive our completion notices in the time allotted, we should call the service center. Representatives at the service center may not have access to the information we need but they will contact their support people to obtain an answer.

Clarification Notices

- Clarification notices will be faxed to LCI within 24 hours of the document transmission containing the error.
- Jimmy Patrick will determine when BellSouth plans to institute an automated process for sending clarifications via EDI and will notify LCI. Harbinger will be kept in the loop in the event the Trading Partner documents require amendments as a result of these change.

Jeopardy Notices

- LCI will be notified by a phone call prior to the due date or on the due date if the due date cannot be met. Jeopardy Notices will be considered late if not received by the due date.
- LCI requests that written notification be issued in the event a due date cannot be met.

Manual Transactions

- Orders that have errors will drop out of the system and be handled manually. In the event that BS has made an error, the manual intervention will be transparent to LCI and the same interval commitments will be in effect. In the event that LCI has made an error, a clarification notice will be sent via fax and EDI within the above time schedule.
- LCI will still receive completion notices via EDI regardless of whether an order was processed manually or electronically.
- LCI requests to know which orders have flow-through and which orders will be processed manually.

Single Point of Contact

- Pattie Knight is our single point of contact for EDI operational process issues.

Other

- Jimmy Patrick will see to it that process documentation is prepared and sent to LCI. Jimmy will call Betty with an estimated completion date for the documentation.

B

EXHIBIT B

BellSouth EDI Performance

| Order # | 850 Sent | 855 Rec'd | 865 Rec'd | Workdays to 855 | Workdays to 865 | 855 Late Workdays |
|-------------|----------|-----------|-----------|-----------------|-----------------|-------------------|
| 4236886622 | 08/28/97 | 9/3/97 | 9/10/97 | 4 | 9 | 3 |
| 34887741 | 08/29/77 | 09/10/97 | 09/10/97 | 8 | 8 | 7 |
| 34906054 | 08/29/97 | 09/03/97 | 9/10/97 | 3 | 8 | 2 |
| 34906087 | 08/29/97 | 09/10/97 | 9/10/97 | 8 | 8 | 7 |
| 4046362620 | 08/29/97 | 9/3/97 | 9/10/97 | 3 | 8 | 2 |
| 4236806596 | 08/29/97 | 9/3/97 | 9/12/97 | 3 | 10 | 2 |
| 7704916842 | 8/29/97 | 9/10/97 | 9/10/97 | 8 | 8 | 7 |
| 34794284A | 8/27/97 | 09/03/97 | 9/3/97 | 5 | 5 | 4 |
| 34794284B | 8/27/97 | 09/03/97 | 9/3/97 | 5 | 5 | 4 |
| 34870434 | 09/03/97 | | | | | |
| 34888481 | 09/03/97 | 09/10/97 | 9/12/97 | 5 | 7 | 4 |
| 34928215 | 09/03/97 | 9/10/97 | 9/17/97 | 5 | 10 | 4 |
| 34730580 | 09/09/97 | | | | | |
| 3486622 | 09/13/97 | 09/18/97 | 9/22/97 | 3 | 5 | 2 |
| 30365298 | 09/13/97 | 09/17/97 | 9/18/97 | 2 | 3 | 1 |
| 34786632 | 09/13/97 | 09/18/97 | 9/22/97 | 3 | 5 | 2 |
| 34794284 | 09/13/97 | | 9/23/97 | | 6 | |
| 34794748 | 09/13/97 | | 10/6/97 | | 15 | |
| 34872151 | 09/13/97 | 10/06/97 | 10/7/97 | 15 | 16 | 14 |
| 4045299333 | 09/13/97 | 9/17/97 | 9/18/97 | 2 | 3 | 1 |
| 4070488283 | 09/13/97 | 9/22/97 | 9/23/97 | 6 | 6 | 4 |
| 4073245884 | 09/13/97 | 9/17/97 | 9/18/97 | 2 | 3 | 1 |
| 7043331188 | 09/13/97 | 9/17/97 | 9/18/97 | 2 | 3 | 1 |
| 9544899020 | 09/13/97 | 9/17/97 | 9/18/97 | 2 | 3 | 1 |
| 9544915254 | 09/13/97 | 9/17/97 | 9/18/97 | 2 | 3 | 1 |
| 9108560796 | 09/16/97 | 9/18/97 | 9/23/97 | 2 | 5 | 1 |
| 34872043 | 09/17/97 | 09/18/97 | 9/22/97 | 1 | 3 | 0 |
| 34894761 | 09/17/97 | 09/22/97 | 10/1/97 | 3 | 10 | 2 |
| 34928161 | 09/17/97 | 09/23/97 | 9/23/97 | 4 | 4 | 3 |
| 30280276 | 10/08/97 | 10/9/97 | | 1 | | 0 |
| 30361448 | 10/08/97 | 10/9/97 | 10/14/97 | 1 | 4 | 0 |
| 35238261 | 10/08/97 | 10/9/97 | | 1 | | 0 |
| 35268493 | 10/08/97 | 10/9/97 | 10/10/97 | 1 | 2 | 0 |
| 35229001 | 10/09/97 | | 10/15/97 | | 4 | |
| 35249022 | 10/09/97 | 10/15/97 | | 4 | | 3 |
| 35229001A | 10/09/97 | 10/13/97 | 10/15/97 | 2 | 4 | 1 |
| 34553699 | 10/10/97 | 10/14/97 | 10/15/97 | 2 | 3 | 1 |
| 35188165 | 10/10/97 | 10/11/97 | 10/13/97 | 1 | 1 | 0 |
| 35300574 | 10/10/97 | | 10/15/97 | | 3 | |
| 30369763 | 10/13/97 | | | | | |
| 35108121 | 10/13/97 | | | | | |
| 36177076 | 10/13/87 | | | | | |
| 35286777 | 10/13/97 | | | | | |
| 30317136-01 | 10/13/97 | | | | | |
| 34755068-05 | 10/13/97 | | | | | |

| | | | | | | |
|------------|----------|----------|----------|---|----|---|
| 35289384 | 10/15/97 | | 11/5/97 | | 15 | |
| 35350052 | 10/15/97 | 10/16/97 | 10/17/97 | 1 | 2 | 0 |
| 35355964 | 10/15/97 | 10/16/97 | 10/21/97 | 1 | 4 | 0 |
| 35369635 | 10/15/97 | 10/17/97 | 10/17/97 | 2 | 2 | 1 |
| 7045883238 | 10/16/97 | | 11/14/97 | | 13 | |
| 9013870272 | 10/16/97 | 10/17/97 | 10/23/97 | 1 | 5 | 0 |
| 9196620226 | 10/16/97 | 10/21/97 | 10/20/97 | 1 | 2 | 0 |
| 30350502 | 10/17/97 | 10/17/97 | 10/22/97 | 1 | 3 | 0 |
| 30366769 | 10/17/97 | 10/17/97 | 10/21/97 | 1 | 2 | 0 |
| 35380491 | 10/17/97 | 10/23/97 | 10/27/97 | 4 | 6 | 3 |
| 7043930448 | 10/17/97 | 10/17/97 | 10/21/97 | 1 | 2 | 0 |
| 35372616 | 10/20/97 | | | | | |
| 35380128 | 10/20/97 | | | | | |
| 35382657 | 10/20/97 | | | | | |
| 30282374 | 10/21/97 | 10/29/97 | | 6 | | 5 |
| 35349430 | 10/21/97 | | 10/27/97 | | 4 | |
| 36390038 | 10/21/97 | 10/23/97 | 10/28/97 | 2 | 5 | 1 |
| 7043924624 | 10/21/97 | | | | | |
| 7043927883 | 10/21/97 | | | | | |
| 7043929661 | 10/21/97 | | | | | |
| 30370747 | 10/22/97 | | | | | |
| 36422528 | 10/22/97 | 10/27/97 | 10/28/97 | 3 | 4 | 2 |
| 7043336233 | 10/22/97 | | 11/3/97 | | 8 | |
| 7043348169 | 10/22/97 | | 11/3/97 | | 8 | |
| 7043448462 | 10/22/97 | | | | | |
| 30369818 | 10/23/97 | | | | | |
| 30370464 | 10/23/97 | 10/29/97 | 10/30/97 | 4 | 5 | 3 |
| 7043324834 | 10/23/97 | | 11/3/97 | | 7 | |
| 7043722005 | 10/23/97 | | | | | |
| 7043930190 | 10/23/97 | 11/4/97 | 11/4/97 | 8 | 8 | 7 |
| 7045419080 | 10/23/97 | 11/3/97 | 11/4/97 | 7 | 8 | 6 |
| 7048271009 | 10/23/97 | 11/4/97 | 11/4/97 | 8 | 8 | 7 |
| 9544758800 | 10/23/97 | | | | | |
| 9545818554 | 10/23/97 | | | | | |
| 30370647 | 10/24/97 | 10/27/97 | 10/29/97 | 1 | 3 | 0 |
| 30371739 | 10/24/97 | 10/25/97 | 10/30/97 | 1 | 4 | 0 |
| 35422110 | 10/24/97 | 10/27/97 | 10/29/97 | 1 | 3 | 0 |
| 35422745 | 10/24/97 | 11/4/97 | | 7 | | 6 |
| 35422760 | 10/24/97 | | 11/4/97 | | 7 | |
| 35422766 | 10/24/97 | | | | | |

Average Response Time for 855s: 3.5 Days

% of Orders on Which FOC Timely Received: 20%

% of Orders on Which No FOC Received via EDI: 38%

| | Submitted | Completed |
|-------------------|-----------|-----------|
| Status of Orders | 80 | 50 |
| Percent Complete: | 62.5% | |

DECLARATION 4

Before the
Federal Communications Commission
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CC Docket No. 97-231

**DECLARATION OF KAY D. SPEERSTRA
ON BEHALF OF LCI INTERNATIONAL TELECOM CORP.**